

**FEE PAID**

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Southern District of California

Division

**FILED**

CLERK, U.S. DISTRICT COURT

**MAY - 5 2023**

CENTRAL DISTRICT OF CALIFORNIA

BY: \_\_\_\_\_ rsm DEPUTY

Todd Michael Schultz

Case No.

**2:23-CV-03452-JAK-MRWx***(to be filled in by the Clerk's Office)*Jury Trial: *(check one)*  Yes  No

-v-

Michael Christopher Thompson

Defendant(s)

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Todd Michael Schultz
Street Address	818 N Doheny Dr. #1108
City and County	West Hollywood, Los Angeles County
State and Zip Code	CA 90069
Telephone Number	3104355847
E-mail Address	toddschultz86@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

TEMPORARY RESTRAINING ORDER  
(TRO)  
CHECKLIST

(A) Check one.

Filing party is represented by counsel

**Filing party is acting in pro se ✓**

**(B) Has there been actual notice, or a sufficient showing of efforts to provide notice to the affected party? See Local Rule 231 and FRCP 65(b).**

Since the harassment began in 2021, I have never once seen Mr. Thompson engage on any matter in good faith. It would be a hazard to my wellbeing to even attempt to facilitate any type of information to Mr. Thompson directly. I am afraid of him and what he may do. Mr. Thompson's communications are always an intentional infliction of emotional distress and hazardous to my mental wellbeing.

Did applicant discuss alternatives to a TRO hearing?

No

Did applicant ask opponent to stipulate to a TRO?

No

Opposing Party:

Telephone No.:

Known online aliases: **Omni-Eris, Omni-Eros, Baron Von Elmo, OmniEris, OmniEris News Network, (new aliases seem to be created in an ongoing manner).**

(C) Has there been undue delay in bringing a TRO?

Mr. Thompson has, by his own admission, inflicted emotional distress upon me in a predominantly psychological fear based campaign of abusive messaging and psychological manipulation using aliases and "sock accounts". I was unaware of that I was being targeted by Mr. Thompson for the intentional infliction of emotional distress for more than one month after it had been occurring. In response to Mr. Thompson's harassment, I became paranoid and began to display psychotic symptoms including paranoia. I underwent a medical rehabilitation that is ongoing.

Could this have been brought earlier?

A: Yes

Page 2

(D) What is the irreparable injury?

Mr. Thompson's bad faith, malicious and premeditated attempts to cause me psychological distress caused me to feel unsafe. Mr. Thompson wants to render me unable to speak for myself. I am in constant fear of what he will do if the situation goes on. The damages to my emotional and professional wellbeing are inexcusable and all in clear bad faith on Mr Thompson's part. He clearly states that I "want to see what happens when I piss me off that much." From December 2021 to mid 2022, Mr. Thompson had placed me under a "stipulation" that I never mention his name to anyone. The repression and ongoing fear of his continued harassment is untenable.

Why the need for an expedited hearing?

I am afraid for my emotional wellbeing. Reviewing the attached images from Mr. Thompson's previous communications with me, I believe the court will find the situation I face with Mr. Thompson untenable and until the court has a chance to review the complaint in a legal process, I need to know that Mr. Thompson cannot stalk, harass or communicate with me using any aliases or venues. I am afraid for my safety.

## Defendant No. 1

Name	Michael Christopher Thompson
Job or Title ( <i>if known</i> )	Online Personality
Street Address	234 Westheimer Rd #3
City and County	Houston, Harris County
State and Zip Code	TX 77006
Telephone Number	
E-mail Address ( <i>if known</i> )	omnieris@gmail.com

## Defendant No. 2

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Todd Michael Schultz, is a citizen of the State of *(name)* California.

b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Michael C. Thompson, is a citizen of the State of *(name)* Texas. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.  
Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

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*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Three Million Dollars USD (\$3,000,000 USD)

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Mr. Thompson has been engaging in what is known colloquially as gangstalking. Mr. Thompson uses clips from my personal livestreams as a part of a for profit show, in which he receives donations from a group of people (usernames: Reamce, Varonika Maigh, Thilluth Thodduth, Tonya Allemand and others).

In order to fuel content for his show, Mr. Thompson's frequently sent emotionally disturbing comments over a prolonged period and is ongoing. I have been threatened and informed that he will never stop attempting to inflict emotional distress. He had threatened me for 7 months that if I ever spoke his name to anyone, he would resume the campaign of harassment indefinitely. A journalist interviewing me for a piece involving two interviews spread 1 year apart, interviewed me in April 2021 and then again in April 2022 or sometime around there. I told him about Mr. Thompson in order to recount my personal history. The aforementioned journalist reached out to him, inquiring about what had happened. Mr. Thompson decided that I had broken his "agreement" to which I took no part in, and resumed harassing me regularly. He purposefully posts as many videos with my name so that he will be able to destroy my reputation. I am afraid of Mr. Thompson and he has told me that he will make sure I am "reviled by anyone who Google searches me." Mr. Thompson has no basis but his own personal animosity for the endeavor. He enjoys torturing me online however he can. I have begged him to stop on several occasions.

In this video, entitled "Todd begs me to stop laughing + Kevin Christian puts underwear on his head 6-16-21 (REUPLOAD)", I pleaded with Mr. Thompson to stop harassing me. He said "you're not a person" and thus refused to engage in good faith discussions.

<https://www.youtube.com/watch?v=NMuMrKk39co&t=3s>

Mr. Thompson admits that he intends to harm me psychologically and professionally - intentional infliction of emotional distress. He admits that he does it maliciously and out of malice. In the link provided at the end of this summary, Mr. Thompson admits to a premeditated campaign meant to inflict the maximum amount of disturbance to my life. He sends provocative communications from various aliases (Baron Von Elmo, OmniErisNewsNetwork, OmniErisArchive, to name a few) These are attempts at disturbing my emotional wellbeing and furthermore, meant to humiliate or defame me however possible. He scares me. I am afraid for my safety as a result of the actions and words stated by Mr. Thompson.

He uses the "Hollywood Laughingstock" YouTube channel to post obscene and defamatory titles that are consistently in bad faith and malicious. Mr. Thompson planned over many months to inflict as much damage on me as possible. He has admitted to wanting me "on the verge of homelessness." His communications create confusion and mental anguish.

Links to Mr. Thompson's admissions of intending to inflict emotional distress.

"Todd Michael Schultz Tempts Fate"

[https://www.youtube.com/watch?v=Wq\\_ZMqaau-8&t=2159s](https://www.youtube.com/watch?v=Wq_ZMqaau-8&t=2159s)

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#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

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The damage to my emotional wellbeing was and continues to be significant.

Mr Thompsons admits to actively seeking to destroy my emotional wellbeing and my professional well being and thus engaged in an ongoing campaign to harass and disturb my emotional and professional wellbeing. For the severity of the offense, and the ongoing malicious and premeditated nature of it, I request that the court fine Mr. Thompson One million dollars USD. His behavior continues to be to inflict harm on my reputation and wellbeing. One million dollars in punitive damages at the very least.

I ask that the court order Mr. Thompson to pay me Two Million dollars USD in compensatory damages for the ongoing emotional trauma I deal with, and to compensate for the damage done to my online book selling business, in which I sold signed books online. Directly to the mental and emotional injuries caused by Mr. Thompson, I was forced to forfeit the business, which had, among grossing 10k in it's first month, was featured in The Hollywood Reporter. The damage to my reputation is at the very least one million dollars USD in compensatory damages. .

In addition to the total 3 million dollars USD I am requesting in punitive and compensatory damages, I am also asking the court to consider criminal charges against Mr. Thompson. He is a threat to my well being, and he targets other individuals and manipulates and harasses them into states very similar to what I went through during 2021.

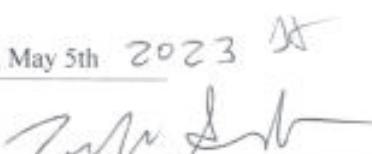
#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

##### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Friday, May 5th 2023



Signature of Plaintiff

Printed Name of Plaintiff

Todd Michael Schultz

##### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

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Name of Law Firm	<hr/>
Street Address	<hr/>
State and Zip Code	<hr/>
Telephone Number	<hr/>
E-mail Address	<hr/>